REMARKS

Claims **1-39** are pending in the application.

Claims **1-39** stand rejected.

Claims **1, 4, 5, 9, 11, 16, 18, 23, 25, 30, 32, and 37** have been amended. Support for

these amendments is provided in the originally-filed specification in paragraph [0052], *inter alia.*

Rejection of Claims under 35 U.S.C. §102

Claims **1-39** stand rejected under 35 U.S.C. § 102(e) as being anticipated by Wakai et al.,

U.S. Patent No. 6,587,126 ("Wakai"). Applicants respectfully traverse this rejection.

In response to Applicants' claim element "converting the request to a second request in a

second language, wherein the second language is used to communicate with the one device," the

Office Action refers to a passage of Wakai beginning in column 13, line 44 to column 14, line 7

and column 14, lines 31-55. (See Office Action dated December 1, 2005, page 3, third full

paragraph.) An excerpt of the relevant parts of this passage is repeated below:

> A request originating at the client component 102 is received by the web
> server 204, which in turn transmits the request to the device manager 205 or
> to the request manager 207. In accordance with the request, the device
> manager 205 either acquires the status of the printer 206 or exercises
> control of the printer 206. The request manager 207 converts the request
> into a process command, and transmits it to the command analysis/process
> unit 208.

The Office Action refers to the "process command" as being equivalent to the second

request. Applicants respectfully disagree and have amended the independent claims to clarify

that the second request is produced by converting the original request and that the one device is

configured to provide the service in response to receiving the second request. Amended

independent claim 1 is shown on the following page:

A method comprising:
obtaining a request to provide a service, wherein
the request conforms to a request format defined in a first language, and
at least one device of a plurality of devices is configured to provide the service;
identifying one device of the at least one device to provide the service; and
converting the request to a second request, wherein
the second request conforms to a second language, and
the one device is configured to provide the service in response to receiving the second
request.

Independent claims 9, 16, 23, 30, and 37 have been amended to include substantially similar

limitations.

Applicants respectfully submit that the Wakai's process command (the purported

counterpart to the claimed "second request") is not received by the printer (the purported

counterpart to the claimed "one device"). Furthermore, the printer is not configured to provide

the service in response to receiving a process command. Instead, if the request is for status of the

printer, the request manager 207 permits a print control unit 601 to control the printer 206. (See

Wakai, column 15, lines 26-31.) In this case, there is no description of converting the request to a

process command at all.

Alternatively, if the request were a request to print information, a process command is

generated as described in the excerpt above. However, request manager 207 transmits the

process command to the command analysis / process unit 208, which analyzes more detailed

information and performs a corresponding process. (See *id.*) In this case, the printer does not

receive the process command, and there is no description of the printer being configured to print

in response to receiving the process command.

While Applicants make no statement as to the appropriate interpretation of Wakai, both

interpretations suffer from infirmities that lead to the conclusion that Wakai cannot anticipate the

claimed invention. For at least these reasons, independent claim 1, its dependent claims 2-8, independent claim 9, its dependent claims 10-15, independent claim 16, its dependent claims 17-22, independent claim 23, its dependent claims 24-29, independent claim 30, its dependent claims 31-36, and independent claim 37, and its dependent claims 38-39 are allowable for at least the foregoing reasons.

Applicants also respectfully submit that the Office Action fails to show the equivalent of the "identifying one device of the at least one device to provide the service." The Office Action refers to Fig. 7 and column 15 line 57 to column 16 line 55. However, Applicants have searched the cited portion and cannot find a counterpart to identifying one device to provide the service from among one or more devices that are configured to provide the service. Therefore, independent claim 1, its dependent claims 2-8, independent claim 9, its dependent claims 10-15, independent claim 16, its dependent claims 17-22, independent claim 23, its dependent claims 24-29, independent claim 30, its dependent claims 31-36, and independent claim 37, and its dependent claims 38-39 are allowable for at least this reason.

In conclusion, claims 1-39 have been shown to be allowable over the Wakai reference, and Applicants respectfully request that the Examiner withdraw the 102(e) rejection and allow the application in its entirety.

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CONCLUSION

In view of the amendments and remarks set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5086.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on

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_____   _3/1/06_
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